



Noelle B. Torrice
1313 North Market Street, Suite 1201
Wilmington, Delaware 19801-6101
Direct Dial: 302.442.7056
Fax: 302.442.7012
ntorrice@beneschlaw.com

July 8, 2024

VIA ECF

The Honorable Evelyn Padin
Martin Luth King Building & US Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Johnson et al. v. Times Internet Limited et al.*, Case No. 2:24-cv-04350-EP-MAH

Dear Judge Padin:

This firm represents Defendant Times Internet Limited in the above referenced case.

We are seeking admission pro hac vice for Matthew P. Farrell. Enclosed are the following:

- (i) Declaration of Noelle B. Torrice in support of Mr. Farrell's admission;
- (ii) Declaration of Matthew P. Farrell in support of admission; and
- (iii) A proposed pro hac vice consent order.

Opposing counsel has advised that Plaintiffs have no objection to entry of the pro hac vice consent order referenced above.

If the order is acceptable, we respectfully request it be entered.

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

s/ Noelle B. Torrice

Noelle B. Torrice

NBT